

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

McAllen Division

V.

United States District Court
Southern District Of Texas
FILED

CRIMINAL COMPLAINT

Dennise Rodriguez

YOB: 1993
COC: United States

DEC 20 2019

Case Number:

David J. Bradley, Clerk

M-19- 3114-M

I the undersigned complainant, state the following is true and correct to the best of my knowledge and belief. On or about December 19, 2019 in Hidalgo County, in the Southern District of Texas defendant(s) did,

knowing or in reckless disregard of the fact that aliens have come to, entered, or remain in the United States in violation of law, transports, or moves or attempts to transport or move such aliens within the United States by mean of transportation or otherwise, in furtherance of such violation of law and brought the alien for the purpose of commercial advantage or private gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) & 1324(a)(2)(B)(ii)

I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

The defendant, a United States citizen and the driver of the vehicle, attempted to bring illegally into the United States through the Donna Port of Entry, a male minor G.J.V.E. (11 years old), a citizen of Mexico, as a United States citizen. At vehicle primary, the defendant claimed the child was her son, a United States citizen, and presented a state of Missouri certificate of birth bearing the name I.V. as proof. Both were referred to secondary for further inspection.

In secondary, a routine inspection revealed the defendant was attempting to bring the child into the United States illegally by using the document belonging to her son. The defendant admitted that she was contacted by her uncle who propositioned her to bring the child into the United States illegally. The defendant went on to say she was instructed by her uncle to use her own son's document in order to facilitate the child's entry into the United States. Once in the United States, she was to turn the child over to his mother who was to be waiting at a local grocery store in Pharr, Texas. She went on to say that she did not know the child, nor the child's parents. The defendant admitted she was going to be paid \$100 US dollars by the child's mother for bringing her child.

Database queries on the child revealed no legal status to enter the United States. The child was transported to a designated holding facility for temporary housing.

Continued on the attached sheet and made a part of this complaint:

☐ Yes

☒ No

Sworn to before me and subscribed in my presence,

Amy D. Silva

Signature of Complainant

Approved By: **Francis Blake**

Amy D. Silva

Printed Name of Complainant

December 20, 2019

Date

Scott Hacker

U.S. Magistrate Judge

Name and Title of Judicial Officer

at

McAllen, Texas

City and State

Signature of Judicial Officer